



Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary

April 28th, 2016

**Re: WC Docket No. 10-90
Salina Spavinaw Telephone Company, Inc. A-CAM Version 2.2
Competitive Coverage Challenge**

Dear Ms. Dortch:

On behalf of Salina Spavinaw Telephone Company, Inc. (SAC 432022), Fred Williamson & Associates, Inc. (FWA) files the following Comments via the FCC's Electronic Comment Filing System (ECFS) to challenge the competitive coverage contained in the Alternative Connect America Cost Model ("A-CAM") version 2.2 pursuant to the streamlined challenge process established by Public Notice.¹

Please contact me if you have any questions.

Sincerely,

Tim Morrissey
President, FWA, Inc.

¹ See Wireline Competition Bureau Releases Alternative Connect America Cost Model Version 2.2 and Illustrative Results and Commences Challenge Process to Competitive Coverage, WC Docket No. 10-90, Public Notice (rel. Apr. 7, 2016) ("Public Notice").

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)
)
Connect America Fund et al.)
Connect America Cost Model Version 2.2 And Illustrative)
Results And Challenge Process to Competitive Coverage)

TO: The Wireline Competition Bureau (Bureau)

COMMENTS – PUBLIC NOTICE

Fred Williamson & Associates (FWA), Inc. submits these Comments on behalf of Salina-Spavinaw Telephone Company, Inc. in response to the Commission’s Public Notice regarding the Challenge process to competitive coverage reflected in the Connect America Fund (CAF) Cost Model, WC Docket No. 10-90, released April 7, 2016 (“*Public Notice*”). FWA provides cost, financial and other consulting services for rural Independent Local Exchange Carriers (rural ILECs).

In this Public Notice, the Commission initiated a Challenge Process for unsubsidized competitors that are reflected in Alternative Connect America Cost Model (A-CAM), Version 2.2. The model has fields that indicate for each census block whether the block is served by a qualifying unsubsidized competitor. Specifically, in the Commission’s *Rate of Return Reform Order*,¹ the Commission directed the Bureau to provide a final opportunity for commenters to challenge the competitive coverage contained in the updated version of the model.² These comments provide challenges to competitive coverage data reflected in the A-CAM 2.2 for Salina-Spavinaw Telephone Company, Inc. (SST), Study Area Code 432022. There are three circumstances reflected in the competitive data in the model that SST is challenging:

¹ Connect America Fund et al., WC Docket No. 10-90 et al., Report and Order et al., FCC 16-33 (rel. March 30, 2016) (*Rate-of-Return Reform Order*).

² Id. At 29, para. 71.

1. Select census blocks that overlap SST's study area boundary are also served by another local exchange carrier (LEC). Several of such census blocks, are inappropriately designated as "served" by a competitive wireline provider in the A-CAM. The A-CAM inaccurately indicates and assumes that the other LEC has facilities and customers within SST's study area boundary. Attachment 1 identifies the census blocks that inappropriately reflect another LEC as a competitor.³ Attachment 1 contains correspondence and data that indicates the other LEC does not provide service outside of its own study area boundaries or within SST's study area. The A-CAM should be modified to reflect these census blocks as "unserved" by a wireline competitor.
2. The A-CAM information indicates that a wireline provider is a qualified competitor in several of the census blocks.⁴ Attachment 2 identifies the census blocks inappropriately indicated as "served" by the wireline provider. Also, referenced in Attachment 2 are zip codes for those census blocks. For each zip code, "screen shots" from the wireline provider's website are provided that indicate that the wireline provider does not provide service in the respective service areas, including the referenced census blocks. The A-CAM should be modified to indicate these census blocks are "unserved" by a wireline competitor.
3. SST is protesting two census blocks based on lack of facilities provided by a wireline competitor in these blocks. The census blocks are numbers 400970405022056 and 400970405013037. SST was able to do a visual inspection of the two census blocks in

³ SST has not challenged all census blocks that overlap its study area boundaries that are potentially served by another LEC, but only those where the A-CAM shows high costs. These census blocks represent those with costs at or above \$50.00 per location/month. The challenge is isolated to the high cost blocks for two reasons. First, these are the only blocks that impact the support amount calculated in the A-CAM. Second, due to the expedited nature of this challenge process, this facilitated meeting the April 28, 2016 deadline.

⁴ See Footnote 3. For the same reasons cited, SST has only challenged the high cost census blocks shown as served in the A-CAM by the wireline competitor.

order to locate any facilities in place by the wireline competitor. Attachment 3 contains an Affidavit of an SST employee that performed a thorough visual inspection of the area. All of the other facilities in the SST study area that had been placed in service by this competitor was accomplished via aerial facilities. The SST employee performing the inspection could not locate any overhead facilities in the areas represented by these two census blocks. The A-CAM should be modified to indicate these census blocks are “unserved” by a wireline competitor.

We appreciate the Bureau’s cooperation with this matter.

Respectfully submitted,

FRED WILLIAMSON & ASSOCIATES, INC.

By, Tim Morrissey

President

121 East College Street

Broken Arrow, OK 74012

Phone: 918-298-1618

Email: tmorrissey@fwainc.com

Dated April 28, 2016

Filed via ECFS

April 28, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554
Attn: Wireline Competition Bureau

Re: Connect America Fund, WC Docket No. 10-90

Dear Ms. Dortch,

Chouteau Telephone Company (Chouteau), Study Area Code 431981, hereby notifies the Federal Communications Commission and the Wireline Competition Bureau that it shares certain Census Blocks with Salina-Spavinaw Telephone Co. Chouteau provides broadband and voice service to the portions of these census blocks located within its study area boundary and does not provide broadband or voice services to the portions of the census blocks outside Chouteau's study area.

Sincerely,



Michael T. Skriyan
VP Regulatory, FairPoint Communications

cc: Katie King, Telecommunications Access Policy Division

Census Blocks Shared between Chouteau and Salina-Spavinaw Telephone Co., where Chouteau provides service only on its side of the study area boundary:

400219776002012
400219776002028
400970405011015
400970405011022
400970405011028
400970405011038
400970405011039
400970405012026
400970405012043
400970405021051

High Cost Census Blocks Inappropriately Shown as Served - SST, SAC 432022

CB	ZIP CODE	SAC	WiredServed	ILECServed	WirelessServed	ProviderName
400219776001013	74347	432022	Served	Served	Unserved	Vyve Broadband A, LLC
400219776001015	74464/74359	432022	Served	Served	Unserved	Vyve Broadband A, LLC
400219776001019	74464/74359	432022	Served	Served	Unserved	Vyve Broadband A, LLC
400219776001036	74464	432022	Served	Served	Unserved	Vyve Broadband A, LLC
400219776001041	74347	432022	Served	Unserved	Unserved	Vyve Broadband A, LLC
400219776002012	74364	432022	Served	Served	Unserved	Vyve Broadband A, LLC
400219776002036	74364	432022	Served	Served	Unserved	Vyve Broadband A, LLC
400219776003007	74464/74444	432022	Served	Served	Unserved	Vyve Broadband A, LLC
400413761002222	74347	432022	Served	Served	Unserved	Vyve Broadband A, LLC
400413761003070	74359	432022	Served	Served	Unserved	Vyve Broadband A, LLC

Note: See attached screen shots for zip codes indicated that demonstrate Vyve does not serve census blocks.



Oh, so sorry. Zip Code 74359 falls outside of the Vyve network.

74359

VYVE ON

No Zip Code? No Problem. Come on in!

CB - 4004 1376 1003070

4002 19776 DD 1019

4002 1977600 1015

Siti says they do not serve
Oaks OK 74359



Oh, so sorry. Zip Code 74364 falls
outside of the Vyve network.

74364

VYVE ON

No Zip Code? No Problem. Come on in!

CB - 400219776002012
CB - 400219776002034

Sete says they do not serve
Rosa OK 74364



Oh, so sorry. Zip Code 74444 falls
outside of the Vyve network.

74444

VYVE ON

No Zip Code? No Problem. Come on in!

GPB - 40021977600307

Site says they do not serve

Moody at 74444



Oh, so sorry. Zip Code 74347 falls
outside of the Vyve network.

74347

VYVE ON

No Zip Code? No Problem. Come on in!

CB - 400413761002222

~~400000~~

400219776001013

400219776001041

Siti says they do not serve
Kansas OK 74347



Oh, so sorry, Zip Code 74464 falls
outside of the Vyve network.

74464

VYVE ON

No Zip Code? No Problem. Come on in!

OB- 400219776001019

400219776001015

400219776001036

400219776003007

Site says they do not serve
Tahlequah OK 74464

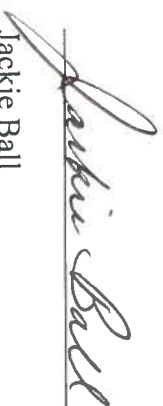
Affidavit of Jackie Ball

1. I am Jackie Ball, Central Office Manager of Salina Spavinaw Telephone Company, Inc. I have worked for Salina Spavinaw in the Telecommunications Industry for over 32 years. I have full knowledge of telecommunications facilities and network requirements.
2. I performed a visual inspection of the areas represented by census blocks 400970405022056 and 400970405013037. These are areas located within Salina's Locust Grove exchange and are extremely rural. I didn't observe any telecommunications facilities, other than Salina Spavinaw's that serve these areas. It is my understanding that Vyve, the competitor shown as providing broadband and voice service in these areas, serves customers utilizing aerial fiber. I didn't observe any such facilities in these areas.

STATE OF OKLAHOMA)
)
COUNTY OF MAYES)

Verification

Jackie Ball, being duly sworn upon his Oath deposes that the statements contained herein are true and correct to the best of his knowledge, information and belief.



Jackie Ball
Central Office Manager
Salina Spavinaw Telephone Company, Inc.

Subscribed and sworn to before me this 26th day of April, 2016.



Notary Public

My commission expires: 4-9-2017

